



Britannic Investment Management Limited

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Conflicts of Interest Policy

1. Introduction

Britannic Investment Management Limited is committed to identifying and managing conflicts of interest that may arise in the course of our investment activities. This Conflicts of Interest Policy outlines the procedures and protocols that we have implemented to identify, mitigate and manage conflicts of interest.

2. Identification of Conflicts of Interest

Britannic Investment Management Limited has implemented a comprehensive process for identifying potential conflicts of interest that may arise in the course of our investment activities. This process includes regular assessments of our business practices, products and services, and relationships with clients and third-party service providers.

3. Mitigation and Management of Conflicts of Interest

Where conflicts of interest are identified, Britannic Investment Management Limited takes appropriate measures to mitigate and manage them. These measures may include:

- Disclosing the conflict of interest to affected clients;
- Implementing controls and procedures to manage the conflict of interest;
- Restricting access to confidential information;
- Limiting involvement of personnel in transactions where a conflict of interest exists; and
- Prohibiting certain activities or transactions where the potential conflict of interest cannot be effectively managed

4. Disclosure of Conflicts of Interest

Where a conflict of interest cannot be effectively managed, Britannic Investment Management Limited discloses the conflict to affected clients. Disclosure is made in a clear and concise manner and includes the nature of the conflict of interest, the measures taken to manage the conflict, and the potential impact on clients.

5. Training and Education

Britannic Investment Management Limited provides regular training and education to personnel on identifying, managing, and disclosing conflicts of interest. This training includes examples of common conflicts of interest and best practices for managing and mitigating them.

6. Review and Monitoring

Britannic Investment Management Limited regularly reviews and monitors its Conflicts of Interest Policy to ensure that it remains effective and relevant. This includes monitoring compliance with the policy, assessing the effectiveness of mitigation measures, and updating the policy as necessary.

7. Conclusion

At Britannic Investment Management Limited, we take conflicts of interest seriously and are committed to implementing robust practices to identify, manage, and mitigate conflicts of interest.

This Conflicts of Interest Policy outlines the procedures and protocols that we have implemented to achieve this goal. We review and update this policy on an ongoing basis to ensure that it remains effective and relevant.